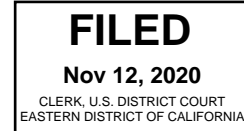


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7

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 CHALONER SAINTILLUS,
15 Defendant.
16

CASE NO. 2:20-cr-0213-KJM

21 U.S.C. §§ 846 and 841(a)(1) – Conspiracy to
Distribute a Controlled Substance;
21 U.S.C. § 841(a)(1) – Distribution of a Controlled
Substance (4 counts); and 21 U.S.C. § 853(a) -
Criminal Forfeiture

17 I N D I C T M E N T

18 COUNT ONE: [21 U.S.C. §§ 846 and 841(a)(1) – Conspiracy to Distribute a Controlled Substance]

19 The Grand Jury charges: T H A T

20 CHALONER SAINTILLUS,
21 defendant herein, beginning on a date unknown but no later than in or around August 2019 and
22 continuing through in or around October 2020, in the County of Sacramento, State and Eastern District
23 of California, and elsewhere, did conspire with other persons, unknown to the Grand Jury, to knowingly
24 and intentionally distribute heroin, a Schedule I controlled substance, oxymorphone, a Schedule II
25 controlled substance, oxycodone, a Schedule II controlled substance, and at least 400 grams of a mixture
26 and substance containing a detectable amount of N-phenyl-N-[1(2-phenylethyl)-4-piperidinyl]
27 (fentanyl), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846
28 and 841(a)(1).

1 COUNT TWO: [21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance]

2 The Grand Jury further charges: T H A T

3 CHALONER SAINTILLUS,

4 defendant herein, on or about April 16, 2020, in the County of Sacramento, State and Eastern District of
5 California, and elsewhere, did knowingly and intentionally distribute oxymorphone, a Schedule II
6 controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

7 COUNT THREE: [21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance]

8 The Grand Jury further charges: T H A T

9 CHALONER SAINTILLUS,

10 defendant herein, on or about April 24, 2020, in the County of Sacramento, State and Eastern District of
11 California, and elsewhere, did knowingly and intentionally distribute heroin, a Schedule I controlled
12 substance, and N-phenyl-N-[1(2-phenylethyl)-4-piperidinyl] (fentanyl), a Schedule II controlled
13 substance, in violation of Title 21, United States Code, Section 841(a)(1).

14 COUNT FOUR: [21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance]

15 The Grand Jury further charges: T H A T

16 CHALONER SAINTILLUS,

17 defendant herein, on or about April 24, 2020, in the County of Sacramento, State and Eastern District of
18 California, and elsewhere, did knowingly and intentionally distribute heroin, a Schedule I controlled
19 substance, and N-phenyl-N-[1(2-phenylethyl)-4-piperidinyl] (fentanyl), a Schedule II controlled
20 substance, in violation of Title 21, United States Code, Section 841(a)(1).

21 COUNT FIVE: [21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance]

22 The Grand Jury further charges: T H A T

23 CHALONER SAINTILLUS,

24 defendant herein, on or about June 17, 2020, in the County of Sacramento, State and Eastern District of
25 California, and elsewhere, did knowingly and intentionally distribute oxycodone, a Schedule II
26 controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

27 ///

28 ///

FORFEITURE ALLEGATION: [21 U.S.C. § 853(a) – Criminal Forfeiture]

1. Upon conviction of one or more of the offenses alleged in Counts One through Five of this Indictment, defendant CHALONER SAINTILLUS shall forfeit to the United States pursuant to Title 21, United States Code, Section 853(a), the following property:

a. All right, title, and interest in any and all property involved in violations of Title 21, United States Code, Section 841(a)(1), or conspiracy to commit such offenses, for which defendant is convicted, and all property traceable to such property, including the following: all real or personal property, which constitutes or is derived from proceeds obtained, directly or indirectly, as a result of such offenses; and all property used, or intended to be used, in any manner or part to commit or to facilitate the commission of the offenses.

b. A sum of money equal to the total amount of proceeds obtained as a result of the offenses, or conspiracy to commit such offenses, for which defendant is convicted.


2. If any property subject to forfeiture, as a result of the offenses alleged in Counts One through Five of this Indictment, for which defendant is convicted:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of defendant, up to the value of the property subject to forfeiture.

A TRUE BILL
/s/ **Signature on file w/AUSA**

FOREPERSON



McGREGOR W. SCOTT
United States Attorney

No. 2:20-cr-0213-KJM

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

CHALONER SAINTILLUS

I N D I C T M E N T

VIOLATION(S):

21 U.S.C. §§ 846 & 841(a)(1) – Conspiracy to Distribute a Controlled Substance;
21 U.S.C. § 841(a)(1) – Distribution of a Controlled Substance (4 counts); and
21 U.S.C. § 853(a), 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c) – Criminal Forfeiture

A true bill,

/s/ Signature on file w/AUSA

Foreman.

Filed in open court this 12th ----- *day*

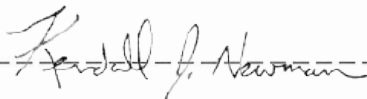
of November -----, A.D. 20 20 -----

/s/ Alexandra Waldrop -----

Clerk.

NO PROCESS NECESSARY

Bail, \$ -----



Kendall J. Newman, United States Magistrate Judge

2:20-cr-0213-KJM

United States v. Chaloner Saintillus
Penalties for Indictment

Defendant
CHALONER SAINTILLUS

COUNT 1:

VIOLATION: 21 U.S.C. §§ 846, 841(a)(1) - Conspiracy to Distribute Controlled Substances

PENALTIES: Mandatory minimum of 10 years in prison and a maximum of up to life in prison; or
Fine of up to \$10,000,000; or both fine and imprisonment
Supervised release of at least 5 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNTS 2-5:

VIOLATION: 21 U.S.C. § 841(a)(1) - Possession with Intent to Distribute Controlled Substances

PENALTIES: Up to 20 years in prison; or
Fine of up to \$1,000,000; or both fine and imprisonment
Mandatory 3 years supervised release

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

FORFEITURE ALLEGATION: all Defendants

VIOLATION: 21 U.S.C. § 853(a) - Criminal Forfeiture

PENALTIES: As stated in the charging document